

# **Exhibit 1**



**ROSS UNIVERSITY**  
SCHOOL OF VETERINARY MEDICINE

## PERSONAL AND CONFIDENTIAL

April 18, 2016

Regarding Case Number: 20161\_26

RE: NOTICE OF EXPULSION

Dear Mr. Anthony Zara,

The Conduct Panel that participated in the hearing held on April 15, 2016 has, based on the standard of more likely than not, reached a determination with respect to the various allegations of the code of conduct made in the complaints that were heard. Based on the charges you were given notice of, the following is a detailed overview of the final determination reached by the Conduct Panel:

- |   |                         |
|---|-------------------------|
| <b>1. Code of Conduct 1.6.3.3</b>   |                         |
| • Physical and Verbal Abuse of police officers – April 6, 2016  | <b>In Violation</b>     |
| • Verbal Abuse of Mr. Dave Wright – April 6, 2016   | <b>In Violation</b>     |
| • Verbal Abuse of Mr. Dave Wright – Nov–Dec 2016 (various dates)  | <b>In Violation</b>     |
| • Physical & Verbal Abuse, Intimidation Harassment of Ms. Alexa Ferrari – May 2015–Dec. 2015 (various dates)  | <b>In Violation</b>     |
| <b>2. Code of Conduct 1.6.3.4</b>   |                         |
| • Bullying of Ms. Alexa Ferrari – May 2015–Dec. 2015 (various dates)  | <b>In Violation</b>     |
| <b>3. Code of Conduct 1.6.3.5</b>   |                         |
| • Damage to St. Kitt's Policeman's Uniform – April 6, 2016  | <b>In Violation</b>     |
| • Damage of Ms. Alexa Ferrari's tires (slashed) – March 2016  | <b>Not In Violation</b> |
| • Damage of Ms. Alexa Ferrari's possessions at Ocean Edge Resort – May 2015   | <b>Not In Violation</b> |
| <b>4. Code of Conduct 1.6.3.9</b>   |                         |
| • Resisting St. Kitt's Police arrest on April 6, 2016   | <b>In Violation</b>     |
| • Fleeing St. Kitt's Police arrest on April 6, 2016   | <b>In Violation</b>     |
| • Failing to comply with directions from Mr. Hazarie Ramoutar and Dr. Charles Wallace to not be present on the premise of the Starboard House.                          | <b>In Violation</b>     |
| <b>5. Code of Conduct 1.6.3.10</b>  |                         |
| • Present on the premise of the Starboard House after receiving ban from property manager Mr. Dave Wright and from on-campus meeting with Mr. Ramoutar and Dr. Wallace. | <b>In Violation</b>     |
| • Unauthorized entry in the Mr. and Mrs. Dave Wright on Dec. 1, 2015  | <b>In Violation</b>     |
| <b>6. Code of Conduct 1.6.3.11</b>  |                         |
| • Dating violence against Ms. Alexa Ferrari – May 2015–Dec. 2015  | <b>In Violation</b>     |
| <b>7. Code of Conduct 1.6.3.12</b>  | <b>In Violation</b>     |
| <b>8. Code of Conduct 1.6.3.17</b>  |                         |
| • Disorderly, disruptive, lewd or indecent; breach of peace – April 6, 2016   | <b>In Violation</b>     |
| • Disorderly, disruptive, lewd or indecent; breach of peace, Ocean Edge Resort – May 2015   | <b>In Violation</b>     |
| • Disorderly, disruptive, lewd or indecent; breach of peace, Starboard House – various dates Summer 2015-Dec. 2015  | <b>In Violation</b>     |
| <b>9. Code of Conduct 1.6.3.18</b>  | <b>In Violation</b>     |

Based on the findings above, the Conduct Panel has determined to issue the sanction of expulsion as the disciplinary measure and final outcome of the hearing. The Conduct Panel determined this based on the evidence presented and taking into consideration the disciplinary measure outlined as potential outcomes in the student handbook.

**RUSVM Expulsion (1.8.4.g):** You are hereby assigned an RUSVM Expulsion as a student at Ross University School of Veterinary Medicine (RUSVM) for behavior that unreasonably interferes with, hinders, obstructs or prevents the regular and essential operation of the University and/or infringes upon the rights of others and a disregard for the security and wellbeing of others.

Effective upon receipt of this letter you are no longer a student of RUSVM and you are not permitted on the campus premises or to attend any academic or non-academic RUSVM events and activities. Any exception to be present on campus or at an RUSVM event or activity requires express written authorization from Hazarie Ramoutar, Director of the Student Experience.

You may elect to appeal the disciplinary measure taken by the Conduct Panel in accordance with Section 1.8.6 of the Student Handbook. If you choose to appeal, you must submit your appeal in writing no later than seven days from the issuance of this letter. Appeal letters should be delivered directly to Interim Associate Dean for Student and Alumni Affairs, Dr. Charles Wallace at [cwallace@rossvet.edu.kn](mailto:cwallace@rossvet.edu.kn). Should Ms. Ferrari appeal, you will be notified of that appeal and the related outcome.

I want to take this opportunity to remind you that the University does not tolerate retaliation of any kind against individuals based on their cooperation in the conduct and hearing process. This applies equally to Parties, witnesses and members of the Conduct Board.

We understand that the conduct hearing process and outcome can be very stressful for participants. In the event you should desire to use the services of the counseling center, we can offer you the use of those services. Please contact Hazarie Ramoutar at [hramoutar@rossvet.edu.kn](mailto:hramoutar@rossvet.edu.kn) to make arrangements for this purpose.

If you have questions or concerns about this case or filing an appeal, please contact me via email at [jefazio@rossvet.edu.kn](mailto:jefazio@rossvet.edu.kn).

Sincerely,

**Jeffrey M. Fazio, M.Ed.**  
Student Engagement  
& Professional Standards Specialist

CC: Hazarie Ramoutar, Director of the Student Experience  
Dr. Charles Wallace, Interim Associate Dean for Student and Alumni Affairs  
Albert Du Plessis, Director, RUSVM Department of Safety and Security